UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HARTFORD FIRE INSURANCE CO., Plaintiff,	)))))	
vs.	))	
EASTERN CONTRACTORS, INC., Defendant/Third-Party Plaintiff,	))))	C.A. No. 03-12502 NMG
vs.	)))	
CITY OF LAWRENCE, CITY OF FALL RIVER, AND FREETOWN/LAKEVILLE REGIONAL SCHOOL DISTRICT, Third-Party Defendants.	)))))	

THIRD-PARTY DEFENDANT/THIRD-PARTY CONTERCLAIMANT'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS

Now comes the Third-Party Defendant/Third-Party Counterclaimant, City of Lawrence, and hereby moves, pursuant to Fed.R.Civ.P. Rule 37(a) and L.R. 7.1(B) for an order compelling the Defendant/Third-Party Plaintiff, Eastern Contractors, Inc., to respond to duly propounded interrogatories and requests for production of documents. The Third-Party Defendant/Third-Party Counterclaimant further seeks an award of expenses, including reasonable attorneys' fees, in having to bring this motion, pursuant to Fed.R.Civ.P. Rule 37(a)(4). As grounds therefore, the Third-Party Defendant/Third-Party Counterclaimant relies upon the attached Memorandum of Reasons.

1

Dated: March 27, 2006

Respectfully submitted,
Third-Party Defendant/Third-Party
Counterclaimant:
CITY OF LAWRENCE,
By its Attorneys,

_____*/s/ Doreen M. Zankowski*_____
Joel Lewin (BBO# 298040)
Doreen M. Zankowski (BBO# 558381)
Hinckley Allen Snyder LLP
28 State Street
Boston, MA 02109-1775
(617) 345-9000

CERTIFICATE OF SERVICE

I, Doreen M. Zankowski, hereby certify that on this 27th day of March 2006, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Bradford R. Carver, Esq.
Eric H. Loeffler, Esq.
Hinshaw & Culbertson, LLP
One International Place, 3rd Floor
Boston, MA 02110

Edward J. Quinlan, Esq.
David J. Keenan, Esq.
Quinlan & Sadowski, P.C.
11 Vanderbilt Avenue, Suite 250
Norwood, MA 02062

/s/ Doreen M. Zankowski
_____